

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

HUZHOU CHUANGTAI RONGYUAN INVESTMENT
MANAGEMENT PARTNERSHIP, HUZHOU
HUIHENG Ying EQUITY INVESTMENT PARTNERSHIP,
and HUZHOU HUI RONG SHENG EQUITY INVESTMENT
PARTNERSHIP

Plaintiffs/Judgment - Creditors,

v.

Judgment-Debtor HUI QIN (a/k/a MUK LAM LI, LI MUK
LAM, HUI HUI QIN, KARL QIN, HUI QUIN), DUO LIU
(a/k/a EMMA LIU), XUEMIN LIU, RUOLEI LIU, XUEYUAN
HAN (a/k/a HANK HAN), HANGYUAN ZHANG, BRYN
MAWR TRUST COMPANY OF DELAWARE, TRIDENT
TRUST COMPANY, ST. TOME LLC, ST. FORTUNE GROUP
LLC, LUXURY TEAM, INC., ST. GRAND CEREMONY LLC,
KING FAME TRADING (BVI), PH2003 UNIT LLC,
APPLEGREEN LLC, LUBAN CONSTRUCTION INC., ST
HUDSON GROUP LLC, GOLDEN PEGASUS LLC, GOLDEN
LITTLE ELEPHANT INC., GOLDEN KIRIN LLC,
HARUSHIO LLC, GOLDEN LITTLE DRAGON, GOLDEN
MERMAID LLC, HATAKAZE LLC, QYNM FAMILY
HOLDING LLC, HS-QYNM FAMILY, INC. QIN FAMILY
TRUST, I LOVE GLE TRUST, APPLEGREEN FAMILY
TRUST, MASTERPIECE HOLDING GROUP LTD., NEW
LAND CAPITAL LLC, YOUYORK MANAGEMENT LLC,
GOLDEN LAND FUNDS LLC, MAXIM CREDIT GROUP
LLC, HFRE, LLC, JOHN and JANE DOES
1-20,

Defendants.

1:24-cv-02219-KPF

**DECLARATION OF JEFFREY S. BOXER IN OPPOSITION TO PLAINTIFFS’
MOTION FOR A PRELIMINARY INJUNCTION**

Jeffrey S. Boxer, an attorney duly admitted to practice law before the Courts of the State of
New York, declares pursuant to 28 U.S.C. § 1746:

1. I am a Partner at Carter Ledyard & Milburn LLP, attorneys for Defendants Xueyuan “Hank” Han (“Mr. Han”), QYNM Family Holding LLC (“QYNM”), HS-QYNM Family Inc. (“HS-QYNM”), and HFRE LLC (“HFRE” and, together with QYNM and HS-QYNM, the “Han Company Defendants”) in this litigation. I make this declaration in opposition to Plaintiffs’ motion for a preliminary injunction (the “PI Motion”).

2. A true and correct copy of the business profile for NEW LIDO THEATRE RESTAURANT NITECLUB PTE. LTD. (198205451Z) on record with the Accounting and Corporate Regulatory Authority of the Government of Singapore (“ACRA”), dated as of April 17, 2024, is attached as **Exhibit A**. An individual named Han Ngi Kwang is identified as a director and shareholder of the company. Han Ngi Kwang appears to be a Singapore citizen.

3. A true and correct copy of the business profile for LIDO PALACE NITECLUB RESTAURANT (32546700E) on record with ACRA, dated as of April 17, 2024, is attached as **Exhibit B**. NEW LIDO THEATRE RESTAURANT NITECLUB PTE. LTD. is identified as the owner of LIDO PALACE NITECLUB RESTAURANT (32546700E).

4. A true and correct copy of the business profile for NEW LIDO (2014) PTE. LTD. (201404935G) on record with ACRA, dated as of April 17, 2024, is attached as **Exhibit C**. An individual named Han Ngi Kwang is identified as a director and shareholder of the company. Han Ngi Kwang appears to be a Singapore citizen.

5. A true and correct copy of the business profile for DELUXE LIDO PALACE PTE LTD (199604861N) on record with ACRA, dated as of April 17, 2024, is attached as **Exhibit D**. An individual named Han Ngi Kwang is identified as shareholder of the

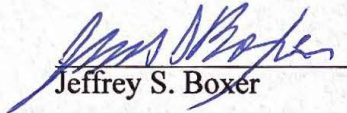
company. There is also an individual named Tan Han Khng who is identified as a director of the company. Both individuals appear to be Singapore citizens.

6. A true and correct copy of the business profile for LIDO MARINE PTE. LTD. (2001007887K) on record with ACRA, dated as of April 17, 2024, is attached as **Exhibit E**. An individual named Han Ngi Kwang is identified as a director and shareholder of the company. Han Ngi Kwang appears to be a Singapore citizen.

7. A true and correct copy of the StreetEasy listing for 377 Rector Place #PHB in Battery Park City, Manhattan, as of April 18, 2024, is attached as **Exhibit F**.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 22, 2024
New York, New York


Jeffrey S. Boxer